

# **EXHIBIT 1**

Lachlin Verrett

December 16, 2021

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF TEXAS  
3 HOUSTON DIVISION

4 DANIELLE NICOLE NIXON,

5 Plaintiff,

6 v.

7 HOUSTON INDEPENDENT  
8 SCHOOL DISTRICT

9 Defendant.

§  
§  
§ CIVIL ACTION NO.  
§ 4:20-cv-01699

§ JURY DEMANDED

10  
11  
12 ORAL DEPOSITION OF  
13 DR. LACHLIN VERRETT  
14 DECEMBER 16, 2021

15  
16 ORAL DEPOSITION OF DR. LACHLIN VERRETT, produced as  
17 a witness at the instance of the Plaintiff and duly  
18 sworn, was taken in the above styled and numbered cause  
19 on Thursday, December 16, 2021, from 10:11 a.m. to  
20 7:54 p.m., before DONNA QUALLS, Notary Public in and for  
21 the State of Texas, by computerized stenotype machine,  
22 at the offices of Spencer Fane, LLP, 3040 Post Oak  
23 Boulevard, Suite 1300, Houston, Texas, pursuant to the  
24 Federal Rules of Civil Procedure, and any provisions  
25 stated on the record or attached hereto.

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1 break.

2 MS. JIMENEZ: Let's go off the record.

3 (Recess from 6:24 p.m. to 6:32 p.m.)

4 THE REPORTER: Back on the record at  
5 6:32 p.m.

6 Q. (BY MS. JIMENEZ) Dr. Verrett, you've read the  
7 transcript in its entirety; is that correct?

8 A. That's correct.

9 Q. Did that refresh your recollection of that  
10 conversation?

11 A. Well, it -- it set a context for me.

12 Q. So is that a "yes," or is that a "no"?

13 A. Well, it's a yes in terms of that -- there's  
14 some gaps in it. I'm not sure if it's one meeting, if  
15 it's two conversations. There was conversation even  
16 before that conversation. So I'm just not confident  
17 that it's an accurate capturing or portrayal of what the  
18 different conversations may have been. I don't know how  
19 this was transcribed.

20 MS. JIMENEZ: I'll object to the  
21 unresponsive portion of it.

22 Q. (BY MS. JIMENEZ) So reading this, did this  
23 refresh your recollection of conversations you've had  
24 with Ms. Nixon?

25 A. It does capture some conversations that we've

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1 had with Ms. Nixon. Did it capture everything about the  
2 conversations? I can't testify to that. There are gaps  
3 in it.

4 Q. So I'm confused.

5 Is that a "yes," or is that a "no"?

6 A. My response is, when I started reading the  
7 transcript and as I read through the transcript, I  
8 noticed that there was a conversation before. I noticed  
9 that this -- this -- it just starts and it ends. And I  
10 cannot say that the transcript actually has everything  
11 that may have been captured in whatever recording. Now,  
12 what's on the transcript is on the transcript. I can  
13 only speak to what is actually on the transcript.

14 MS. JIMENEZ: I'm going to object to the  
15 nonresponsive portion of that.

16 Q. (BY MS. JIMENEZ) I think my question was do  
17 you recall having this conversation with Ms. Nixon?

18 A. I remember having a conversation -- many  
19 conversations with Ms. Nixon, yes.

20 Q. Was this one of the many conversations you had  
21 with her?

22 A. Without certainty of the actual document, if  
23 some things are missing --

24 MS. WHITE: Don't speculate.

25 A. Well, for -- for me, that...

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1 MS. JIMENEZ: I'm going to object to the  
2 coaching.

3 Q. (BY MS. JIMENEZ) You can finish your response.

4 A. Okay. I was waiting for the attorney to stop  
5 whispering.

6 Q. That's okay.

7 A. So restate the question, please.

8 Q. Do you recall having this conversation with  
9 Ms. Nixon?

10 A. I do recall some of the content in the  
11 transcript in terms of a conversation with Ms. Nixon.

12 MS. JIMENEZ: I'm going to object to the  
13 unresponsive portion of the answer after he said, "I do  
14 recall."

15 MS. WHITE: I'm sorry. I didn't hear the  
16 end of what you said.

17 MS. JIMENEZ: Can you read back?

18 (Requested portion read back.)

19 Q. (BY MS. JIMENEZ) Did you ever tell Ms. Nixon,  
20 (as read) "It seems like" -- "you made it seem like I  
21 was" -- "I'm just looking for a white person"?

22 Did you ever tell Ms. Nixon that?

23 A. According to the transcript, I was addressing  
24 Ms. Nixon's misunderstanding or her lack of  
25 understanding around a conversation that was held